

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

JOHNNIE STEPHENS,

Plaintiff,

v.

**BUREAU OF COLLECTION
RECOVERY, INC.,**

Defendant.

§
§
§
§
§
§
§
§
§
§

Civil Action No. 2:13-cv-669

NOTICE OF REMOVAL

Defendant, Bureau of Collection Recovery, Inc. (“Defendant”), by counsel and pursuant to 28 U.S.C. §§ 1331 and 1441 and 15 U.S.C. § 1692k(d), hereby files this Notice of Removal, and in support sets forth the following grounds:

1. On or about July 26, 2013, Defendant was served with Plaintiff’s Complaint, a copy of which is attached hereto, in an action entitled *Johnnie Stephens v. Bureau of Collection Recovery, Inc.*, filed of record with the 71st Judicial District Court of Harrison County Texas, Case No. 13-0563.

2. Plaintiff’s Complaint purports to set forth causes of action under 15 U.S.C. §§ 1692 *et seq.*

3. This Court has original jurisdiction over Plaintiff’s cause of action based on 15 U.S.C. §§ 1692, *et seq.*, as set forth in 28 U.S.C. § 1331, and 15 U.S.C. § 1692k(d). Pursuant to 28 U.S.C. § 1441, therefore, the civil action pending in the 71st Judicial District Court of Harrison County Texas, is removable to this Court.

4. Defendants have attached an Index of Attachments to this notice itemizing Exhibits A-F as required by 28 U.S.C. § 1446(a) and Local Rule 81 as follows:

- A. A true and correct copy of all process, pleadings, and papers filed and served in this action as of the date of filing this Notice of Removal;
- B. Notice of Removal to be filed in state court;
- C. List of Parties and Attorneys; and
- D. Declaration.

5. Thirty (30) days have not yet expired since receipt of Plaintiff's Complaint.

6. Defendant has provided written notice of the filing of this Notice of Removal to Plaintiff, by regular mail on this date and has also forwarded a Notice for filing with the Clerk of the 71st Judicial District Court of Harrison County, Texas regarding this Notice of Removal.

Based on the foregoing, Defendant prays that the above-captioned action now pending in the 71st Judicial District Court of Harrison County, Texas be removed therefrom and placed on the regular docket of the United States District Court for the Eastern District of Texas, Marshall Division.

Respectfully submitted,

BUSH & RAMIREZ, P.L.L.C.

//s// Keith Wier

Keith Wier; SBN: 21436100

Fed. ID No. 7930

5615 Kirby Dr., Suite 900

Houston, Texas 77005

(713) 626-1555 Telephone

(713) 622-8077 Telecopier

**ATTORNEY FOR DEFENDANT,
BUREAU OF COLLECTION RECOVERY, INC.**

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of August, 2013, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system and provided a copy to Plaintiff by first class mail as follows:

Gabriel Meyrat
P.O. Box 570396
Dallas, TX 75357

//s// Keith Wier
Keith Wier